

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 19-10096 JCM
	:	
ERIC JON KUHN AND	:	HONORABLE JOHN C. MELARAGNO
TAMIKA ALLEN-KUHN,	:	
Debtors	:	CHAPTER 13
	:	
M&T BANK,	:	RELATED TO CLAIM #9
Movant,	:	
	:	
v.	:	
	:	
ERIC JON KUHN AND TAMIKA ALLEN-	:	
KUHN; and RONDA J. WINNECOUR,	:	
CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE
FILED IN COMPLIANCE WITH THE LOCAL RULES

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

THE QUINN LAW FIRM

BY: /s/ Michael S. Jan Janin
Michael S. Jan Janin, Esquire
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Counsel for Debtors

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Debtors	:	CHAPTER 13
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Movant,	:	
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	:	
ERIC JON KUHN AND TAMIKA ALLEN-	:	
KUHN; and RONDA J. WINNECOUR,	:	
CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

**CERTIFICATE OF SERVICE OF DECLARATION REGARDING
NOTICE OF MORTGAGE PAYMENT CHANGE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on November 2, 2023.

The type(s) of service made on the parties was Electronic Notification via the CM/ECF System.

- Office of the United States Trustee at ustregion03.pi.ecf@usdoj.gov
- Ronda J. Winnecour at cmecf@chapter13trusteedpa.com
- Brian Nicholas, attorney for M&T Bank, at bnicholas@kmlawgroup.com

Dated: November 2, 2023

Respectfully submitted,

THE QUINN LAW FIRM

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